REMARKS

Reconsideration of the above-identified patent application in view of the amendments above and the remarks following is respectfully requested.

Claims 1-21 are in this case. Claims 5-7 have been rejected under § 112, second paragraph. Claims 1-21 have been rejected under § 102(e). Claim 15 has been rejected under § 103(a). Claim 4 has been objected to. Dependent claim 13 has been canceled. Independent claims 1, 18 and 21 and dependent claims 4, 6, 7 and 14 have been amended.

The claims before the Examiner are directed toward a method, system and computer program product for supplying comparative information about specified items. Each item has a data entry in a computer's storage. Each data entry includes a name, one or more topics, and, associated with each topic, one or more values. Data entries corresponding to the items to be compared are retrieved from storage. The associated values are compared, and the results of the retrieving and comparing are presented as natural language sentences.

Please note that references herein to the specification are to the patent application as published, US Published Patent Application No. 2001/0032077.

§ 112, Second Paragraph Rejections

The Examiner has rejected claims 5-7 under § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Specifically, the Examiner has pointed out that claims 5-7 recite "substeps (i), (ii), (iii) and (v)" that lack antecedent basis.

"Substep (i)" refers to lines 3-6 of claim 4. "Substep (ii)" refers to lines 7 and 8 of claim 4. These substeps are described in paragraph 0015 of the specification. Claim 4 has been amended accordingly.

"Substep (iii)" refers to lines 2-4 of claim 6. This substep is described in paragraph 0016 of the specification. Lines 5-7 of claim 6 should be referred to as "substep (iv)", as described in paragraph 0054 of the specification. Claim 6 has been amended accordingly.

"Substep (v)" refers to lines 2-4 of claim 7. This substep is described in paragraph 0017 of the specification. Lines 5 and 6 of claim 7 should be referred to as "substep (vi), as described in paragraph 0059 of the specification. Claim 7 has been amended accordingly.

§ 102(e) Rejections – Kelman et al. '255

The Examiner has rejected claims 1-21 under § 102(e) as being anticipated by Kelman et al., US Published Patent Application No. 2004/0093255 (henceforth, "Kelman et al. '255"). The Examiner's rejection is respectfully traversed.

Kelman et al. '255 teach a "technology enabled selling" (TES) system that includes in its functionality a sales effectiveness application whose "generate module" generates natural language documents that may include comparisons of competing products. For example, Figure 14 shows a template for generating a document that includes a comparison of "Message Mart" and "Mallsuite".

The input to the generate module is in the form of "datagems" that are generated by an authoring software application. Many of the datagems are natural language sentences. This is clear from paragraph 0057:

> Input data **102** are examples of the types of data that may be transmitted to the administration computer **104** and to the central database **112**. Input data **102** includes a variety of content from a

> variety of sources. As shown, the input data **102** may include audio files, portable document format ("PDF") files, graphics files, text files, or generally any electronic data commonly transmitted. The content may include, for example, brochures, white papers, website content, interviews with customers, etc. A particular item of data **102** may include valuable information that may be placed in several different categories. For example, a white paper may have details about the strong or weak points of particular products, details about a particular customer's unique needs, and other useful information. In one embodiment, certain system users with administrative responsibility and pertinent skills and experience, such as marketing people in a user organization, review the input data **102** using an authoring software application on administration computer **104**. The administration computer **104** may run the authoring software application locally or remotely to allow administration of the system. The authoring application is a client/server application used to author and manage the information in the central database. The input data **102** is reviewed and broken into smaller pieces of information at a subdocument level. The smaller pieces of information, referred to as datagems, may then be classified in a manner that is helpful to members of the organization wishing to access the information later. For example, a datagem may be classified as a customer or user requirement, as a product feature, or as a success story. (emphasis added)

As best understood, the generate module does not construct natural language sentences to be included in natural language documents, but merely inserts, concatenates and/or rearranges natural language sentences that already appear in the datagems.

By contrast, the present invention, as recited in claim 1, constructs natural language sentences that incorporate topics and attribute values related to items being compared. The attribute values of the present invention are numbers, words and phrases, rather than complete sentences. Some examples of such attribute values are listed in paragraph 0045: "big", "blue", "round", "shirt", "computer" "apple", "expensive", "fast", "high", "top", "alone", KX-456 cellular phone", "made in USA", "breakfast", and "stone". In constructing natural language sentences, the present invention optionally combines these attribute values with their associated topics to produce phrases such as the ones listed in paragraph 0045: "blue color", "round

shape", "big size", expensive look", "high resolution", "top quality", "playing alone", "KX-4546 cellular phone model", "used for cooking breakfast", and "a center piece made of stone". The present invention includes sufficient semantic and lexical intelligence to then present the attribute values and the topic-value combinations as natural-language sentences. Thus, the present invention is not anticipated by Kelman et al. '255.

Nevertheless, it could be argued that it would be obvious to include such topic-value combinations among the datagems of Kelman et al. '255, and that a user of the generate module of Kelman et al. '255 could look up these topic-value combinations and construct his or her own natural language sentences, incorporating the topics and values, for inclusion in a document that is generated by the generate module. Therefore, claims 1, 18 and 21 have been amended to include the limitation from claims 3 and 19 that the information associated with each topic includes at least one value, and the limitations from claim 13 that the construction of the natural language sentences includes providing templates for constructing the natural language sentences and inserting names, topics and values, as determined by the comparing step, into appropriate places in the templates. Note that paragraph 0043 states that the use of the templates to construct natural language sentences applies both to the standard comparison module described in paragraphs 0012 through 0018 and recited in claims 3-7 and to the relation comparison module described in paragraphs 0019 through 0040 and recited in claims 8-12. Correspondingly, the limitation that the information associated with each topic includes at least one value has been deleted from claims 3 and 19, claim 13 has been deleted and claim 14 has been amended to depend directly from claim 1. In addition, the templates are described in claim 1 as "natural language sentence" templates rather than as "statement" templates to

emphasize the difference between the present invention and the arguably obvious use of the invention of Kelman et al. '255 described above. It is not obvious to provide natural language sentence templates in the context of the teachings of Kelman et al. '255 because a human user of the generate module of Kelman et al. '255 would not need such templates in order to construct natural language sentences.

In rejecting claim 13, the Examiner argued that the generate module of Kelman et al. '255 inserts names, topics and values into appropriate places in the templates that the generate module inherently must use. As best understood, the "appropriate places" in the presumed templates of Kelman et al. '255 are slots for receiving entire natural sentences as present in the datagems. Therefore, to further distinguish the present invention from the teachings of Kelman et al. '255, claims 1, 18 and 21 have been amended to state that the names, topics and values are inserted into appropriate "respective fields" in the templates. This amendment is supported in the specification by paragraph 0049 as amended:

> Two major units used to construct the output are a routine named "cmp_SubstVars" and another routine named "update_compare_text". "Cmp_SubstVars" receives a string where various variables are present and replaces the variables with the relevant content. Whereas the content is to be prepared in advance by the calling routine, cmp_SubstVars identifies the variables in the input string provided that the variables are capitalized and enclosed in brackets followed by the % sign, as in: <%VARIABLE_NAME%>. The replacement is done using a simple search of the substrings "<%" and "%>" and looking up the variable enclosed in a look up table. The table contains the names of the accepted variables and pointers to the memory where the content to substitute said variables resides. (emphasis added)

The "variables" of this paragraph are the fields that receive the respective names, topics and values.

With independent claims 1 and 18 allowable in their present form, it follows that claims 2-12, 14-17, 19 and 20, that depend therefrom, also are allowable.

§ 103(a) Rejections – Kelman et al. '255

The Examiner has rejected claim 15 under § 103(a) as being unpatentable over Kelman et al. '255 in view of claim 14. The Examiner's rejection is respectfully traversed.

It is demonstrated above that independent claim 1 is allowable in its present form. It follows that claim 15, that depends therefrom, also is allowable.

Objections to the Claims

The Examiner has objected to claim 4 as containing two sentences. Claim 4 now has been amended to correct this informality.

Objections to the Specification

The Examiner has objected to the title as being non-descriptive. A descriptive title now has been provided.

The Examiner has objected to the specification for lacking an introductory sentence that describes the priority document, US 60/196,303. Such an introductory sentence now has been provided.

Amendments to the Specification

Two inadvertent typographical errors in paragraph 0049 have been corrected. Three inadvertent typographical errors in paragraph 0054 have been corrected.

No new matter has been added.

In view of the above amendments and remarks it is respectfully submitted that independent claims 1, 18 and 21, and hence dependent claims 2-12, 14-17, 19 and 20 are in condition for allowance. Prompt notice of allowance is respectfully and earnestly solicited.

Respectfully submitted,

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